

HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CALVIN JONES, individually, and on  
behalf of all others similarly situated,

Plaintiff,

v.

EFINANCIAL, LLC, a Washington  
Limited Liability Company, and PARAISO  
RELIANT DIRECT INSURANCE  
SERVICES, INC., a California  
Corporation,

Defendants.

No. 2:19-cv-01612-RSM

STIPULATION FOR DISMISSAL OF  
ACTION

NOTE ON MOTION CALENDAR:  
AUGUST 31, 2020

TO: The Clerk of the Court

Plaintiff Calvin Jones and defendants eFinancial, LLC and Paraiso Reliant Direct Insurance Services, Inc., being the only parties who have appeared in this action, stipulate and agree pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) that the above-entitled action shall be dismissed with prejudice as to Plaintiff's individual claims, and without prejudice as to the class's claims, and without costs to either party.

The Clerk of the Court is hereby requested to enter this dismissal in the records of the Court.

STIPULATION FOR DISMISSAL OF ACTION  
(No. 2:19-cv-01612-RSM) – 1

**Perkins Coie LLP**  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
Phone: 206.359.8000  
Fax: 206.359.9000

1 DATED this 31st day of August, 2020.

2  
3 By /s/ Eric R. Draluck

4 Eric R. Draluck, WSBA No. 19881  
5 Attorney at Law  
6 PO Box 11647  
7 Bainbridge Island, WA 98110  
8 Telephone: (206) 605-1424  
9 edraluck@gmail.com

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29

Avi R. Kaufman (*pro hac vice*)

KAUFMAN P.A.  
400 NW 26th St.  
Miami, FL 33127  
Telephone: (305) 469-5881  
kaufman@kaufmanpa.com

*Attorneys for Plaintiff Calvin Jones*

By: /s/ Nicola C. Menaldo

Nicola C. Menaldo WSBA # 44459  
**Perkins Coie LLP**  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
Telephone: 206.359.8000  
Facsimile: 206.359.9000  
Email: NMenaldo@perkinscoie.com

James G. Snell (*pro hac vice*)

**Perkins Coie LLP**  
3150 Porter Drive  
Palo Alto, CA 94304-1212  
Telephone: 650.838-4300  
Facsimile: 650.838.4350  
Email: JSnell@perkinscoie.com

Debra R. Bernard (*pro hac vice*)

**Perkins Coie LLP**  
131 South Dearborn Street, Suite 1700  
Chicago, IL 60603-5559  
Telephone: 312.324.3400  
Facsimile: 312.324.9400  
Email: DBernard@perkinscoie.com

*Attorneys for Defendant eFinancial, LLC  
and Paraiso Reliant Direct Insurance  
Services, Inc.*